



*Who is handling site mlr*

# LEGACY ENVIRONMENTAL SERVICES, INC.

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**CERTIFIED MAIL  
ARTICLE NUMBER P 418 683 822  
RETURN RECEIPT REQUESTED**

March 14, 1997

Harold Gabel  
Guilford County Health Department  
301 North Eugene Street  
Greensboro, NC 27401

Reference: Notice concerning the request for a Corrective Action Plan (CAP) without the requirement to meet groundwater quality standards in 15A NCAC 2L 0.0202  
2205 Oak Hill Drive  
Greensboro, North Carolina  
DWQ Incident # 10017

Dear Mr. Gabel,

This letter is being provided to inform you that the State's Division of Environmental Management is being requested to approve an environmental cleanup activity in your area. In accordance with North Carolina Statutes, a set of Groundwater Classifications and Standards has been put in place for the protection of all groundwaters across the state. Because your property is located adjacent to other properties that may be involved in groundwater cleanup, the law requires that you be informed of these activities.

Pursuant to the notification requirements of Title 15A NCAC 2L.0114(b), Legacy Environmental Services, Inc., an environmental consultant on behalf of Melvin Yarboro, is providing notice of the request for a corrective action plan under 15A NCAC 2L.0106(l). This property is located at 2205 Oak Hill Drive in Greensboro, NC.

Some of the constituents found at the above location are typical of fuel oil have been detected beneath this site in concentrations which exceed the Groundwater Quality Standards outlined in 15A NCAC 2L .0202 and action levels for soil contamination contained in "Groundwater Section Guidelines for the Investigation and Remediation of Soils and Groundwater (March 1997)". Legacy Environmental Services, Inc. believes that if the proposed Corrective Action Plan is approved by the Division of Water Quality, implementation will result in the following:

The proposed natural attenuation CAP protects the public health, environment, and adjacent property uses/values by remediating all secondary contaminant sources (contaminated soil). To cost-effectively ensure adequate protection of local groundwater resources, groundwater at the contaminant source will be remediated by natural processes of degradation and attenuation prior to contacting any receptors. All wells at the site will be monitored semi-annually for the first 2 years after soil remediation, then annually for three additional years.

Some additional reasons this CAP should be relied upon for restoration are as follows:

- 1.) Soil excavation and off-site disposal will remediate contaminated soils to NCDEHNR action levels. Soil sampling will be conducted following excavation to confirm removal of secondary sources.
- 2.) A monitor well network has been installed at the site which defines the contaminant plume and can be used to ensure that contaminant concentrations are being reduced at the plumes leading edges. This well network will also allow monitoring to ensure that contaminants do not leave property boundaries.
- 3.) Contaminant travel has been predicted with reasonable certainty and should not reach the nearest property line within 5 years once soil remediation is achieved. Degradation, dispersion, sorption, and retardation effects should ensure that contaminants will never cross property boundaries.

Any written comments concerning this request should be submitted within 30 days of *March 14, 1997* to the office of Ms. Sherri Knight, Groundwater Supervisor for the North Carolina Department of Environment, Health and Natural Resources in Winston-Salem, N.C. In addition, the Winston-Salem Regional Office has this proposed Corrective Action Plan with detailed site information on record for public perusal. You may make copies of the information obtained at a charge of 10 cents per page. Please send written comments and requests to examine this proposed Corrective Action Plan to the following address:

Ms. Sherri Knight  
Winston-Salem Regional Office - DWQ  
585 Waughtown Street  
Winston-Salem, NC 27107

Sherri Knight may be contacted during normal weekday working hours at 1 (910) 771-4600 to answer any and all questions pertaining to this request. Notification of this request for Corrective Action is also being made by certified mail to Mr. H.G. Gabel, Guilford County Health Department Director, and J. Edward Kitchen, City Manager.

Sincerely,

A handwritten signature in black ink, appearing to read "Henry Nemargut". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Henry Nemargut, P.E.  
Legacy Environmental Services, Inc.

L97-162E

cc. LES files P-342